

Exhibit E

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Page 1

1 because I was unable to find them.
2 A. I -- I can't imagine. The only times
3 I'd ever deleted a tweet were if I misspelled
4 something that I deleted it to put another tweet
5 up.
6 Q. So you didn't delete anything that was
7 responsive to this lawsuit being filed.
8 A. No.
9 Q. Okay. How many followers do you have on
10 Twitter?
11 A. Right now?
12 Q. Yes, sir.
13 A. More than 25,000. I don't know how many
14 I have.
15 Q. What did you have back in 2022?
16 A. I have no idea.
17 Q. Think. I mean guess. I'm not asking
18 you for particular number, but did you have 5,000,
19 50,000?
20 A. I don't think I've ever had 50,000. I
21 would guess that I had more than 5,000, and you
22 said 2022?
23 Q. Yes, sir.
24 A. Okay. I -- so I'll just tell you. I
25 started blogging in 2006, and looking to see how

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
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11 [REDACTED]
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17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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1 many people had read something that I wrote was bad
2 for me. I liked to see that a lot of people read
3 what I wrote, and I stopped looking at things like
4 that because --
5 Q. Is it fair to say you --
6 A. -- it would be prideful.
7 Q. -- you had anything between 5 and 25,000
8 back in 2022?
9 A. Yeah. I would say that's probably
10 right.
11 Q. Okay.
12 A. I mean --
13 THE REPORTER: Slow down, everybody.
14 THE WITNESS: I'm so sorry. I'm so
15 sorry.
16 A. I would guess that I had around 20,000
17 maybe.
18 BY MS. RILEY:
19 Q. I'm not trying to hold you. I'm just
20 trying to see if --
21 A. I --
22 Q. -- you have a general idea of how many
23 followers you had.
24 Okay. Now let's get into your tweets.
25 A. Okay.

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1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
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21 [REDACTED]
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23 [REDACTED]
24 [REDACTED]
25 [REDACTED]

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[illegible][illegible][illegible]

1 number I just called out that ends in 617. The
2 next one is LYELL_00349031. The next one is
3 LYELL_00349570. The next one is 00348748, and the
4 last one is LYELL_00348466.
5 (Witness reviews document.)
6 A. Okay.
7 BY MS. RILEY:
8 Q. Okay. Can you tell me what that
9 document is that I've just handed you?
10 A. It's a multipage document that presents
11 a thread of tweets that I posted on Twitter along
12 with some people's replies.
13 Q. So you don't dispute that these were
14 screenshotted or taken from your email thread -- I
15 mean your tweet thread?
16 A. I'll stipulate that I wrote all of this.
17 Q. Okay. All right. And on the first one
18 on the first page, it shows that an @JenLyell was
19 tagged?
20 A. Yes. Yes, that I'm replying to -- I'm
21 replying to a tweet that mentioned her.
22 Q. Okay.
23 A. And that mentioned me.
24 Q. So that means that all of her followers
25 saw your response; is that correct?